



CITY OF RICHMOND

DEPARTMENT OF PUBLIC UTILITIES

OFFICE OF THE DIRECTOR

November 8, 2010

Water Docket
Environmental Protection Agency
Mailcode: 28221T
1200 Pennsylvania Ave., NW
Washington, DC 20460

Department of Conservation and Recreation
Commonwealth of Virginia
203 Governor Street
Richmond, VA 23219

Re: EPA Water Docket ID No. EPA-R03-OW-2010-0736, Draft Total Maximum Daily Load ("TMDL") for the Chesapeake Bay; and Virginia Chesapeake Bay Watershed Implementation Plan ("WIP")

To Whom It May Concern:

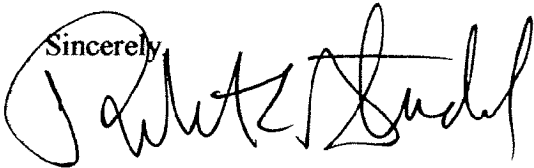
Thank you for the opportunity to comment on EPA's Draft TMDL for the Chesapeake Bay and Virginia's WIP. We own and operate a combined sanitary and separate storm sewer system within the Chesapeake Bay watershed. The City of Richmond knows that the Draft TMDL is fundamentally and materially flawed as a technical matter, especially with regards to the wasteload allocations assigned to cities with combined sewer systems. These issues are thoroughly documented in the **Comments on the Draft Chesapeake Bay TMDL by the Alexandria Sanitation Authority, and the Cities of Alexandria, Lynchburg, and Richmond**, Docket Number EPA-R03-OW-2010-0736, November 8 2010 attached to this letter. We request that EPA fully consider and address all of these comments, which we support and hereby incorporate by reference as if fully set forth herein.

In closing:

1. The City of Richmond (COR) strongly supports the primary use standard of the James River and that the applicable water quality standards should be based on sound scientific and engineering principles protective of that use.
2. COR ratepayers have the highest wastewater rates in the Commonwealth of Virginia for major metropolitan areas (Draper Aden 2010) and the stormwater utility is one of only a handful in the Commonwealth and the only one in the Richmond metropolitan area.
3. The projected COR capital improvement plan program for the Chesapeake TMDL is \$30 million for wastewater and \$500 – 800 million for stormwater.

4. The recurring annual operating costs for the improvement for the Chesapeake Bay TMDL are estimated in the \$100s of millions for wastewater and stormwater.
5. The rate impact of the Chesapeake Bay TMDL improvements has been calculated to increase the wastewater bill to the ratepayers by 4% per year for 20 years and to increase the stormwater bill from \$45 per equivalent residential unit (ERU) to \$300 – 700 per ERU.
6. Current 10 year COR capital improvements plan program for wastewater and stormwater collection and treatment total in the \$10s of millions of dollars for each fiscal year funded by the ratepayers.
7. COR is proactively implementing the stormwater management program through the voluntary establishment of the stormwater utility in difficult economic circumstances.

For further information, please contact me at 804-646-5182.

Sincerely,


Robert C. Steidel
Interim Director Department of Public Utilities

c: Mr. Alan Pollock, VA DEQ (alan.pollock@deq.virginia.gov)
Mr. Russ Perkinson, VA DCR (russ.perkinson@dcv.virginia.gov)
Mr. Christopher Beschler, Deputy Chief Administrative Officer, City of Richmond
Mr. Greg O'Halloran, Assistant City Attorney, City of Richmond
file